

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

### **REMARKS**

In the foregoing amendment, claims 1, 4-7, 9-14, 16, 18, 20-22, 26-28, 30-32, 34-39, 41-45 and 47-48 have been amended and claims 50-51 were added to better claim the invention. Claims 3, 15, 17, 19, 25 and 33 have been canceled without prejudice. Now pending in the application are claims 1-2, 4-14, 16, 18, 20-24, 26-32 and 34-51, of which claims 1, 11, 20, 31, 41, 44 and 47 are independent.

#### **I. Summary of Objections and Rejections**

Claims 1, 9-11, 20, 41 and 43-44 stand objected because of minor informalities.

Claims 31-40 stand rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter.

Claims 4, 11-19 and 31-40 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite.

Claims 1-2, 5-17, 20-21, 26-27, 29, 31 and 33-48 stand rejected under 35 U.S.C. §102(e) as being anticipated by US Patent No. 6,829,579 to Davis et al. (hereinafter "Davis").

Claims 3-4 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of US Patent Application Publication No. 2003/0023755 (hereinafter "Harris").

Claims 18, 30 and 32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of "Towards to Portable Source Code Representations Using XML" (hereinafter "Mamas").

Claims 19, 23, 28 and 49 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Davis.

Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of Office Notice.

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

Claim 24 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of US Patent No. 5,797,011 to Kroll et al. ("Kroll").

Claim 25 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of US Patent No. 5,507,030 to Sites ("Sites").

These objections and rejections will be discussed separately below.

## **II. Claim Objections**

In the Office Action, Claims 1, 9-11, 20, 41 and 43-44 were objected to because of minor informalities (Office Action, page 2). Applicant has amended claims 1, 10, 11, 20, 41, 44 and 47 to address the Examiner's concerns. In view of the claim amendments, Applicant respectfully requests that the Examiner withdraw the above objection to claims 1, 9-11, 20, 41 and 43-44.

## **III. Claim Rejections under 35 U.S.C. §101**

In the Office Action, claims 31-40 were rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter (Office Action, page 2).

The Examiner claims that the claims recite a system that is software per se (Office Action, page 3). Applicant has amended claim 31 to recite a system including a processor and a display. Applicant submits that the amended claims recite hardware elements and are not software per se. Claims 32-40 depend from claim 31. In view of the above, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 31-40.

## **IV. Claim Rejections under 35 U.S.C. §112**

In the Office Action, claims 4, 11-19 and 31-40 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite (Office Action, page 3).

### **A. Claim 4**

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

In the Office Action, the Examiner claims that "the tense of the claim is incorrect," and "it is unclear which output descriptions are intended by the recited "other output descriptions" (Office Action, page 4). Applicant has amended claim 4 to correct the tense, as suggested by the Examiner. Applicant has also amended claim 4 to remove "other output descriptions." In view of the above, Applicant respectfully requests that the Examiner withdraw the above rejection of claim 4.

**B. Claims 11-19**

In the Office Action, the Examiner claims that those of ordinary skill in the art would not be reasonably apprised of the intended metes and bounds of the term "focus" (Office Action, page 4). Applicant has amended claims 11-14 and 44-45 to change the term "focus" to "cursor." In view of the above, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 11-19.

**C. Claims 31-40**

In the Office Action, the Examiner refers to claim 32, which depends upon claim 31 and recites that "the markup generator generates the input and output code markup files using markup programming languages." The Examiner claims that "those of ordinary skill in the art would not recognize what was intended by 'input and output code markup files' which were not generated using markup programming language" in claim 31 (Office Action, page 4).

Applicant believes that the foregoing amendments to claims 31 and 32 address the Examiner's concern. In view of the above, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 31-40.

**V. Claim Rejections under 35 U.S.C. §102**

In the Office Action, claims 1-2, 5-17, 20-21, 26-27, 29, 31 and 33-48 were rejected under 35 U.S.C. §102(e) as being anticipated by Davis (Office Action, page 5). Applicant respectfully traverses this rejection.

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

**A. Claims 1 and 41**

Applicant respectfully urges that Davis does not disclose at least the following feature of claims 1 and 41: "identifying an output description that corresponds with the input description, the output description being associated with a second cross-reference that matches the first cross-reference."

Davis relates to translating a source file (abstract). Davis discloses that "the source window 74 displays the source elements 86 while the translation window 76 displays the translation elements 88" (column 8, lines 6-8). Davis also discloses that "corresponding groups of elements 90 are aligned in the source and display windows 74 and 76 to allow simultaneous viewing of source elements 86 and their translations 88" (column 8, lines 11-14). Although Davis discloses aligning the source element and the translation elements, Davis provides no disclosure about cross-references that are associated with the source elements and the translation elements.

Davis is silent about using cross-references to identify a source element and its corresponding translation element.

For reasons set forth above, Applicant respectfully urges that Davis fails to disclose every feature of claims 1 and 41. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 1 and 41 under 35 U.S.C. §102(e).

**B. Claims 2, 5-10 and 42-43**

Claims 2 and 5-10 depend from claim 1 and, as such, incorporate the subject matter of claim 1. Claims 42-43 depend from claim 41 and, as such, incorporate the subject matter of claim 41. For reasons set forth above, Applicant respectfully urges that Davis fails to disclose every feature of claims 2, 5-10 and 42-43. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 2, 5-10 and 42-43 under 35 U.S.C. §102(e).

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

**C. Claims 11 and 44**

Applicant respectfully urges that Davis does not disclose "displaying a first cursor in an input description" and "displaying a second cursor automatically in the output description," which is present in claims 11 and 44. Davis does not disclose cursors displayed in an input description and corresponding output description.

Additionally, Applicant respectfully urges that Davis does not disclose "identifying an output description that corresponds with the input description, the output description being associated with a second cross-reference that matches the first cross-reference," which is present in claims 11 and 44. As discussed above, Davis is silent about cross-references associated with the input description and the output description.

For reasons set forth above, Applicant respectfully urges that Davis fails to disclose every feature of claims 11 and 44. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 11 and 44 under 35 U.S.C. §102(e).

**D. Claims 12-17 and 45-46**

Claims 12-14 and 16-17 depend from claim 11 and, as such, incorporate the subject matter of claim 11. Claims 45-46 depend from claim 44 and, as such, incorporate the subject matter of claim 44. For reasons set forth above, Applicant respectfully urges that Davis fails to disclose every feature of claims 12-14, 16-17 and 45-46. Claim 15 has been canceled, thus the rejection of claim 15 is moot. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 12-17 and 45-46 under 35 U.S.C. §102(e).

**E. Claims 20 and 47**

Applicant respectfully urges that Davis does not disclose "connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

indicate that the connected portions in the first and second segments are corresponding to each other," which is present in claims 20 and 47. Davis does not disclose a connection line that connects an input description and an output description.

For reasons set forth above, Applicant respectfully urges that Davis fails to disclose each and every element of claims 20 and 47. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 20 and 47 under 35 U.S.C. §102(e).

**F. Claims 21, 26-27, 29 and 48**

Claims 21, 26-27 and 29 depend from claim 20 and, as such, incorporate the subject matter of claim 20. Claim 48 depends from claim 47 and, as such, incorporates the subject matter of claim 47. For reasons set forth above, Applicant respectfully urges that Davis fails to disclose every feature of claims 21, 26-27, 29 and 48. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 21, 26-27, 29 and 48 under 35 U.S.C. §102(e).

**G. Claim 31**

Applicant respectfully urges that Davis does not disclose at least the following feature of claim 31: "a processor configured to ... identify the output code that corresponds to the input code, the output code being associated with a second cross-reference that matches the first cross-reference." As discussed above, Davis does not disclose cross-references associated with the input code and the output code.

For reasons set forth above, Applicant respectfully urges that Davis fails to disclose every feature of claim 31. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claim 31 under 35 U.S.C. §102(e).

**H. Claims 33-40**

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

Claims 34-40 depend from claim 31 and, as such, incorporate the subject matter of claim 31. For reasons set forth above, Applicant respectfully urges that Davis fails to disclose every feature of claims 34-40. Claim 33 has been canceled, thus the rejection of claim 33 is moot. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 31 and 33-40 under 35 U.S.C. §102(e).

**VI. Rejections of Claims 3-4 under 35 U.S.C. §103**

In the Office Action, claims 3-4 were rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of Harris (Office Action, page 14). Applicant respectfully traverses this rejection.

Claims 3-4 depend from claim 1 and, as such, incorporate the subject matter of claim 1. Applicant submits that Davis and Harris, taken either singly or in any reasonable combination, do not disclose or suggest at least the following feature of claim 1: "identifying an output description that corresponds with the input description, the output description being associated with a second cross-reference that matches the first cross-reference."

As discussed above, Davis does not disclose or suggest this feature.

Harris relates to delivering content to mobile devices. Harris discloses that uniform content may be converted to device-specific content depending on the mobile device requesting the content (paragraph [0007]). Harris also discloses a mobile content framework (MCF) that may translate a generic markup language into mobile device markup languages (paragraph [0007]). With the MCF of Harris, the content developer may provide content to multiple types of devices without providing different versions of the content (abstract).

Harris, however, does not disclose or suggest first and second cross-references that are associated with input descriptions and output descriptions, respectively, and the second cross-reference matching the first cross-reference, as is present in claim 1. Harris is silent about cross-references associated with input descriptions and output descriptions. Although Harris is

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

combined with Davis, the combined references would not disclose or suggest cross-references associated with input descriptions and output descriptions.

For reasons set forth above, Applicant respectfully urges that Davis and Harris, taken either singly or in any reasonable combination, do not disclose or suggest the Applicant's claimed "identifying an output description that corresponds with the input description, the output description being associated with a second cross-reference that matches the first cross-reference" which is present in claims 3-4. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 3 and 4 under 35 U.S.C. §103(a).

**VII. Rejections of Claims 18, 30 and 32 under 35 U.S.C. §103**

In the Office Action, claims 18, 30 and 32 were rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of Mamas (See Office Action, page 15). Applicant respectfully traverses this rejection.

**A. Claim 18**

Applicant respectfully urges that Davis and Mamas do not disclose or suggest "the output description being associated with a second cross-reference that matches the first cross-reference," which is present in claim 18.

As discussed above, Davis is silent about cross-references associated with an input description and an output description. Mamas discloses using XML (eXtended Markup Language) to represent Document Object Model (DOM) annotated trees (p. 175). Nowhere does Mamas disclose or suggest attaching cross-references to input descriptions and output descriptions using XML where a cross-reference may be used to identify an output description and its corresponding input description or vice-versa.

For reasons set forth above, Applicant respectfully urges that Davis and Mamas, taken either singly or in any reasonable combination, fail to disclose or suggest every feature of claim 18. Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claim 18 under 35 U.S.C. §103(a).



Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

**B. Claim 30**

Applicant has amended claim 20 to incorporate the subject matter of claim 25, which is not rejected by Davis and Mamas. Claim 30 depends from claim 20 and, as such, incorporates the subject matter of claim 20. In view of the amendments, Applicant respectfully urges that the above rejection of claim 30 is moot. Applicant therefore respectfully requests that the Examiner withdraw the above rejection of claim 30 under 35 U.S.C. §103(a).

**C. Claim 32**

As discussed above, Davis does not disclose or suggest "a display configured to ... display a connection line that connects the input code and corresponding output code so that users are able to trace the output code generated from corresponding input code and the input code from which corresponding output code is generated," which is present by claim 32. Applicant respectfully urges that Mamas does not disclose or suggest the above feature of claim 32. Therefore, Applicant respectfully urges that Davis and Mamas, taken either singly or in any reasonable combination, fail to disclose or suggest all of the features of claim 32. For reasons set forth above, Applicant respectfully requests that the Examiner withdraw the above rejection of claim 32 under 35 U.S.C. §103(a).

**VIII. Rejections of Claims 19, 23, 28 and 49 under 35 U.S.C. §103**

In the Office Action, claims 19, 23, 28 and 49 were rejected under 35 U.S.C. §103(a) as being unpatentable over Davis (Office Action, page 16). Applicant respectfully traverses this rejection.

**A. Claim 19**

Claim 19 has been canceled, therefore the above rejection to claim 19 is moot.

**B. Claims 23 and 28**

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

Applicant respectfully urges that Davis does not disclose or suggest "connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to indicate that the connected portions in the first and second segments are corresponding to each other," which is present in claims 23 and 28. Applicant urges that Davis does not disclose a connection line that connects the input description and the output description. Therefore, Davis fails to disclose or suggest all of the features of claims 23 and 28.

For reasons set forth above, Applicant respectfully requests that the Examiner withdraw the above rejection of claims 23 and 28 under 35 U.S.C. §103(a).

**C. Claim 49**

Applicant respectfully urges that Davis does not disclose or suggest that "connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to indicate that the connected portions in the first and second segments are corresponding to each other," which is present in claim 49. Applicant urges that Davis does not disclose a connection line that connects the input description and the output description. Therefore, Applicant urges that Davis fails to disclose every feature of claim 49.

For reasons set forth above, Applicant respectfully requests that the Examiner withdraw the above rejection of claim 49 under 35 U.S.C. §103(a).

**IX. Rejection of Claim 22 under 35 U.S.C. §103**

In the Office Action, claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of Office Notice (Office Action, page 18). Applicant respectfully traverses this rejection.

Applicant urges that Davis does not disclose or suggest "connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to indicate that the connected portions in the first and second segments are corresponding to each other," which is present in claim 22. Applicant urges that Davis does not disclose a connection line that

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

connects the input description and the output description. Therefore, Applicant urges that Davis fails to disclose every feature of claim 22.

For reasons set forth above, Applicant respectfully requests that the Examiner withdraw the above rejection of claim 22 under 35 U.S.C. §103(a).

**X. Rejection of Claim 24 under 35 U.S.C. §103**

Claim 24 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of US 5,797,011 (Office Action, page 18). Applicant respectfully traverses this rejection.

Applicant respectfully urges that Davis does not disclose or suggest that "connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to indicate that the connected portions in the first and second segments are corresponding to each other," which is present in claim 24. Applicant urges that Davis does not disclose a connection line that connects the input description and the output description. Therefore, Applicant urges that Davis fails to disclose every feature of claim 24.

For reasons set forth above, Applicant respectfully requests that the Examiner withdraw the above rejection of claim 24 under 35 U.S.C. §103(a).

**XI. Rejection of Claim 25 under 35 U.S.C. §103**

Claim 25 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in view of US 5,507,030 ("Sites") (Office Action, page 19). Applicant respectfully traverses this rejection.

Applicant respectfully urges that Davis and Sites, taken either singly or in any reasonable combination, fail to disclose or suggest at least the following feature of claim 25: "connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to indicate that the connected portions in the first and second segments are corresponding to each other."

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

The Examiner recognizes that Davis does not disclose or suggest this feature (Office Action, page 19). Applicant agrees.

The Examiner claims Sites at Fig. 16, reference number 214 compensates for the deficiencies of Davis. (Office Action, page 19). Applicant respectfully disagrees.

Sites discloses a translator that may be used to translate from CISC (complex instruction set computing) instructions to RISC (reduced instruction set computing) instructions (Figs. 8 and 9). The referenced figure identified by the Examiner discloses that the translator creates an error-specific flowgraph (Fig. 16). The error-specific flowgraph includes "a heavy dotted line 214 along an arc over the path where the error was traced" (column 24, lines 7-9). Sites discloses that "[t]he heavy dotted line 214 connects the block 210 at the beginning of the procedure to the block 213 where the uninstantiated variable was first used" (column 8, lines 11-13). Sites, however, does not disclose or suggest that a portion in the first segment and a corresponding portion in the second segment are connected through a connection line to indicate that the coupled portions in the first and second segments are corresponding to each other. The dotted line of Sites connects the blocks in the same flowgraph.

For reasons set forth above, Applicant respectfully urges that Davis and Sites, taken either singly or in any reasonable combination, fail to disclose or suggest every feature of claim 25.

Therefore, Applicant respectfully requests that the Examiner withdraw the above rejection of claim 25 under 35 U.S.C. §103(a).

## **XII. New Claims 50 and 51**

New claims 50 and 51 have been added to depend from claim 1 and 41 and, as such, incorporate the subject matter of claims 1 and 41, respectively. Support for the new claims can be found in original figures and specification. For the reasons set forth above, Applicant submits that new claims 50 and 51 are in condition for allowance.

## **XIII. Conclusion**

Application No.: 10/763,487  
Art Unit: 2193

Docket No.: MWS-095

In view of the above amendment, Applicant believes the pending application is in condition for allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicant's attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-095. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: November 26, 2007

Respectfully submitted,

By 

Kevin J. Canning

Registration No.: 35,470

LAHIVE & COCKFIELD, LLP

One Post Office Square

Boston, Massachusetts 02109-2127

(617) 227-7400

(617) 742-4214 (Fax)

Attorney/Agent For Applicant